

### REMARKS

Claims 1, 4-12, 14-19, 21, 24, 25, 27-30, 33-35, 37-39, and 41-55 are pending in the application. Claims 1, 4, 5, 14-19, 24, 25, 27, 29, 30, 33-35, and 41-44 are amended, and claims 45-55 are added. Claims 2, 3, 13, 20, 22, 23, 26, 31, 32, 36, and 40 are cancelled. The following table is provided to assist the Examiner in identifying the independent claims, namely claims 1, 25, 27, 43, and 51-55.

	Embodiment A	Embodiment B	Embodiment C
computer-readable medium claim format	1	43	53
method claim format	26	51	54
means-plus-function claim format	27	52	55

Based on the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and that they be withdrawn.

### Interviews

1. The Applicants thanks the Examiner for the interview on July 17, 2007. During the interview, claim 1 and the Hennessey et al. patent (U.S. Patent No. 6,014,461), the Wang et al. patent (U.S. Patent No. 5,802,361), and the Brill et al. patent (U.S. Patent No. 6,816,184) were discussed.
2. The Applicants thanks the Examiner for the interview on August 23, 2007. During the interview, claim 1 and the Brill et al. patent (U.S. Patent No. 6,816,184), the Tserng patent (U.S. Patent No. 6,570,608), the Liang et al. patent (U.S. Patent No. 6,678,413), the Divakaran et al.

patent (U.S. Patent No. 6,763,069), and the Xu et al. patent (U.S. Patent No. 6,813,313) were discussed.

**Anticipation Rejection Based on Wang**

3. On pages 2-7 of the Office Action, claims 1, 4-5, 7-17, 20-22, 24-26, 28-32, 34 and 36-44 are rejected under 35 U.S.C. § 102(b) as being anticipated by Wang et al. (U.S. Patent No. 5,802,361) (hereinafter Wang). Applicant respectfully traverses the rejection.

Initially, it is noted that claims 13, 20, 22, 26, 31, 32, 36, and 40 are cancelled.

As to amended claim 1, Wang fails to teach this claim for at least the following three reasons. First, Wang fails to teach a video surveillance system. In rejecting the claim, the Office Action aligned the recited video surveillance system with the digitizer/scanner 101 in Figure 1 of Wang. The digitizer/scanner 101 of Wang, however, is not a video surveillance system. Wang, column 7, lines 20-23. Instead, Wang teaches searching a database of images or video. Wang, column 1, lines 7-10; column 7, lines 13-16. Wang lacks any teaching or even a suggestion of a video surveillance system. Hence, Wang fails to teach claim 1 for a first reason.

Second, Wang fails to teach extracting video primitives by identifying one or more objects in the video. In rejecting the claim, the Office Action aligns the recited video primitives with image processing, citing Wang, column 8, lines 20-39 and column 13, line 50, to column 14, line 17. The low level image processing by the low level analyzer 121 of Wang extracts statistical abstractions from each image, which is not extracting video primitives by identifying one or more objects in the video. Wang, column 8, lines 25-28. Hence, Wang fails to teach claim 1 for a second reason.

Third, Wang fails to teach a user-defined event discriminator to detect an occurrence of a

user-defined event in the video. In rejecting claim 1, the Office Action aligned the recited user-defined event discriminator with a search inquiry, citing Wang at column 8, lines 40-47. Wang gives examples of a search inquiry. Wang, column 19, lines 49-64. As can see from these examples, the search inquiry of Wang is an inquiry of the low-level image attributes and is not a user-defined event discriminator to detect an occurrence of a user-defined event in the video. Hence, Wang fails to teach claim 1 for a third reason.

Thus, amended claim 1 is allowable over Wang.

Claims 25, 27 (from which claim 28 depends), and 43 recite similar features as claim 1 and are allowable for at least similar reasons as discussed above with respect to claim 1.

The remaining rejected claims depend variously from claims 1, 25, 27, and 43 and are allowable as being dependent from an allowable claim.

#### **Anticipation Rejection Based on Hennessey**

3. On pages 8-12 of the Office Action, claims 1, 4-5, 13-14, 20-22, 24-30, 32, 34, and 37-44 are rejected under 35 U.S.C. § 102(b) as being anticipated by Hennessey et al. (U.S. Patent No. 6,014,461) (hereinafter Hennessey). Applicant respectfully traverses the rejection.

Initially, it is noted that claims 13, 20, 22, 26, 32, and 40 are cancelled.

As to amended claim 1, Hennessey fails to teach this claim for at least the following three reasons. First, Hennessey fails to teach a video surveillance system. In rejecting the claim, the Office Action aligned the recited video surveillance system with a vision system used for military surveillance, citing Hennessey at column 1, lines 43-45. Hennessey, however, is referring to image analysis, and not a video surveillance system. In fact, Hennessey does not even use the word "video" in the entire document. Hennessey lacks any teaching or even a suggestion of a

video surveillance system. Hence, Hennessey fails to teach claim 1 for a first reason.

Second, Hennessey fails to teach extracting video primitives by identifying one or more objects in the video. In rejecting the claim, the Office Action aligns the recited video primitives with the primitives of Hennessey, citing Hennessey at Figure 2, item 204. The primitives in block 204 of Figure 2 of Hennessey, however, are low level image attributes, such as edges and lines, which are not video primitives extracted by identifying one or more objects in the video. Hennessey, column 3, lines 33-34; Figure 3. Hence, Hennessey fails to teach claim 1 for a second reason.

Third, Hennessey fails to teach a user-defined event discriminator to detect an occurrence of a user-defined event in the video. In rejecting claim 1, the Office Action aligned the recited user-defined event discriminator with the knowledge base 204 in Figure 2 of Hennessey, citing the object detection in Figure 30 of Hennessey. Hennessey, however, teaches in Figure 30 training the knowledge base 204 by the programmer, which is not a user-defined event discriminator to detect an occurrence of a user-defined event in the video. Hennessey, column 12, lines 23-28. Moreover, referring to Figure 2 of Hennessey, the knowledge base 210 is used to classify 209 attributes of objects 208 and is not used to determine primitives comprising objects 206. Hence, Hennessey fails to teach claim 1 for a third reason.

Thus, amended claim 1 is allowable over Hennessey.

Claims 25, 27, and 43 recite similar features as claim 1 and are allowable for at least similar reasons as discussed above with respect to claim 1.

The remaining rejected claims depend variously from claims 1, 25, 27, and 43 and are allowable as being dependent from an allowable claim.

**Anticipation Rejection Based on Brill**

3. On pages 12-17 of the Office Action, claims 1, 4-22, and 24-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Brill et al. (U.S. Patent No. 6,816,184) (hereinafter Brill) in view of Hennessey. Applicant respectfully traverses the rejection.

Initially, it is noted that claims 13, 20, 22, and 26 are cancelled.

As to amended claim 1, Brill fails to teach this claim for at least the following three reasons. First, Brill fails to teach a user-defined event. Instead, Brill teaches pre-programmed events, where a user selects one of the pre-programmed events. Brill, Figure 8; column 8, lines 38-41. The events of Brill are not defined by a user. In fact, a user is unable to define an event such as "ENTER CAR" or "EXIT CAR" using the Brill system. Further, Hennessey fails to overcome the deficiencies of Brill. Hence, Brill fails to teach claim 1 for a first reason.

Second, Brill fails to teach extracting video primitives from the video regardless of what or when event discriminators are defined, where each video primitive extracted is independent of any user-defined event described by the user-defined event discriminators. Instead, Brill teaches extracting information from the video dependent on the pre-programmed events. The events in the motion graph of Figure 3 of Brill are the only events that can be determined by the system, per the event selection box of Figure 8 of Brill. Brill, Figure 3, column 4, lines 5-50; Figure 8, column 8, lines 38-41. The events in the motion graph of Figure 3 of Brill are dependent on what events that the programmer determined for the Brill system and when the programmer programmed the Brill system. The events that are extracted from the video using the motion graph of Figure 3 of Brill are not independent on what events the programmer selected for the system. As a result, the Brill system provides no flexibility for a user to define events for the system and, instead, the user is only allowed to select from the limited choices pre-programmed

into the Brill system. Further, Hennessey fails to overcome the deficiencies of Brill. Hence, Brill fails to teach claim 1 for a second reason.

Third, Brill fails to teach checking the extracted video primitives against at least one of the user-defined event discriminators to determine whether any user-defined events described by the checked user-defined event discriminators occurred in the video. Instead, Brill teaches checking the motion graph of Figure 3 against selected pre-programmed events of Figure 8 to determine if any selected pre-programmed event occurred, which is not checking the extracted video primitives against at least one of the user-defined event discriminators to determine whether any user-defined events described by the checked user-defined event discriminators occurred in the video. Brill, Figure 3, column 4, lines 5-14; Figure 8, column 8, lines 38-41. Further, Hennessey fails to overcome the deficiencies of Brill. Hence, Brill fails to teach claim 1 for a third reason.

Thus, amended claim 1 is allowable over Brill.

Claims 25 and 27 recite similar features as claim 1 and are allowable for at least similar reasons as discussed above with respect to claim 1.

The remaining rejected claims depend variously from claims 1, 25, and 27 and are allowable as being dependent from an allowable claim.

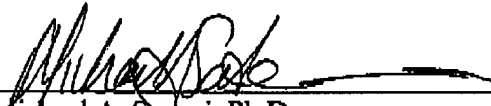
### CONCLUSION

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that all presently outstanding rejections be reconsidered and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Response is respectfully requested.

Respectfully submitted,

Date: September 19, 2007

  
Michael A. Sartori, Ph.D.  
Registration No.: 41,289  
VENABLE LLP  
P.O. Box 34385  
Washington, D.C. 20043-9998  
Telephone: (202) 344-4000  
Telefax: (202) 344-8300

MAS/ab  
DC2-892864